

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

VITALLIANCE CORPORATION,

Plaintiff,

v.

I+SOLUTIONS, a Dutch company,

Defendant

CASE NO. 3:20-CV-00002

**AGREED MOTION TO ENLARGE TIME TO RESPOND TO PLAINTIFF'S  
FIRST AMENDED COMPLAINT AND REQUEST FOR INJUNCTIONS**

Defendant i+Solutions (“Defendant”) and Plaintiff Vitalliance Corporation (“Plaintiff”) jointly move to enlarge the time for Defendant to respond to Plaintiff’s First Amended Complaint and Requests for Injunctions (the “Complaint”), up to and including April 14, 2020. Defendant and Plaintiff (individually, “Party” and collectively, the “Parties”) move for such relief, and in support state:

1. Plaintiff filed its Complaint on January 4, 2020. [Dkt. No. 7]. Defendant’s current deadline to answer or otherwise respond, is February 12, 2020.
2. The Parties’ require additional time to consider and engage in alternative dispute resolution procedures.
3. This motion is not presented for the purposes of delay, but rather so that justice may be done. No other deadlines will be affected by the extension of time sought.
4. No Party will be prejudiced by granting the requested agreed relief.

For these reasons, the Parties respectfully request the Court to enlarge the time to and including April 14, 2020 for Defendant to respond to the Complaint [Dkt. No. 7] by granting the

stipulation and proposed order agreed upon by the Parties and presented herewith and to grant each Party such other and further relief to which they are justly entitled.

Dated: February 11, 2020.

Respectfully submitted,

/s/ Clement Osimetha  
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*Attorneys for i+Solutions  
Pro Hac Vice forthcoming*

### **CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel for Defendant i+Solutions has conferred with counsel for Plaintiff Vitalliance Corporation, and all parties so identified are **AGREED** to the relief sought.

/s/ LaCrecia Perkins  
One of Counsel

**CERTIFICATE OF SERVICE**

I certify that on February 11, 2020, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court.

/s/ LaCrecia Perkins  
One of Counsel